

# EXHIBIT 45

## RESPONSE TO OMNIBUS OBJECTION

### I. CONTACT INFORMATION

Name: Irma Colón Vega

Mailing Address      P.O. Box [illegible]  
Coto Laurel, Puerto Rico  
00780-0868

Contact Phone Home: \_\_\_\_\_ Cell 787 638-9366

*Claim Number: 139162, 140270 and 143397*

### II. Caption

#### A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

#### B. Commonwealth of Puerto Rico et al. (Debtors)

#### C. Case Number: 17 BK 3283 - LTS

#### D. Omnibus Objection regarding amounts not paid by the Commonwealth of Puerto Rico:

Evidence by proof of claim numbers:

#49762 – Act 89 – Romerazo – Effective July 1, 1995

*Act 134 – Retirement Contribution      July 1996*

#94057 – June 6, 2008 Pay Scale Act – Step Increases

*Act 164 – Pay Raise      July 2003*

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

*Act 164 (2004) of Ms. Sila Calderón – effective January 2004*

### III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 “Romerazo” – Effective July 1, 1995

*Act 134 – Retirement Contribution      July 1996*

June 6, 2008 Pay Scale Act – Step Increases

*Act 164 – Pay Raise      July 2003*

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón, effective January 2004

#### IV. Supporting Documentation

Enclosed are documents evidencing my years of service with the Puerto Rico Telephone Company, Ponce, Puerto Rico, from the 5th of December of 1988 through the 1st of January of 2011. I ended my career as a Office Worker [illegible] and Service Representative III with the Puerto Rico Telephone Company, Ponce, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of educational service.

Enclosed are documents in support of this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Irma Colón Vega

Printed name

[signature] 10-2-2021

Signature Original date of request 8-7-18

*PS: The basis of my claim is for money owed in pay raises under Laws that were enacted during my years of service with Puerto Rico Telephone Co. Act 164 Pay Raise July 2003, Act 89 – Romerazo July 1995, and Act 164 Sila M. Calderón of 2004. As such, I do not agree with the cancellation of my claim.*

*Many thanks for your prompt attention in this regard.*

*PS I am including a receipt from the postal service dated 1-8-22 when I sent the Response to Omnibus Objection.*

*Many thanks,*

[signature]

Case:17-03283-LTS Doc#:21054-1 Filed:05/24/22 Entered:05/27/22 14:39:19 Desc:  
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JUANA DIAZ  
72 CALLE EXT MUNOZ RIVERA  
JUANA DIAZ, PR 00795-9998  
(800)275-8777

01/08/2022 10:55 AM

Product	Qty	Unit Price
First-Class Mail® Large Envelope San Juan, PR 00918 Weight: 0 lb 1.40 oz Estimated Delivery Date Tue 01/11/2022	1	\$1.36
First-Class Mail® Large Envelope New York, NY 10036 Weight: 0 lb 1.40 oz Estimated Delivery Date Thu 01/13/2022	1	\$1.36
First-Class Mail® Large Envelope New York, NY 10166 Weight: 0 lb 1.40 oz Estimated Delivery Date Thu 01/13/2022	1	\$1.36

Grand Total: \$4.08

Cash \$10.08  
Change -\$6.00

\*\*\*\*\*  
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increases and limited employee  
availability due to the impacts of  
COVID-19. We appreciate your patience.  
\*\*\*\*\*

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destinations outside the contiguous US may  
be affected by the limited availability of  
transportation.

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All sales final on stamps and postage.  
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or scan this code with your mobile device,



or call 1-800-410-7420.

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PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

## CERTIFICATION

**IRMA VEGA**  
**XXX-XX-0432**

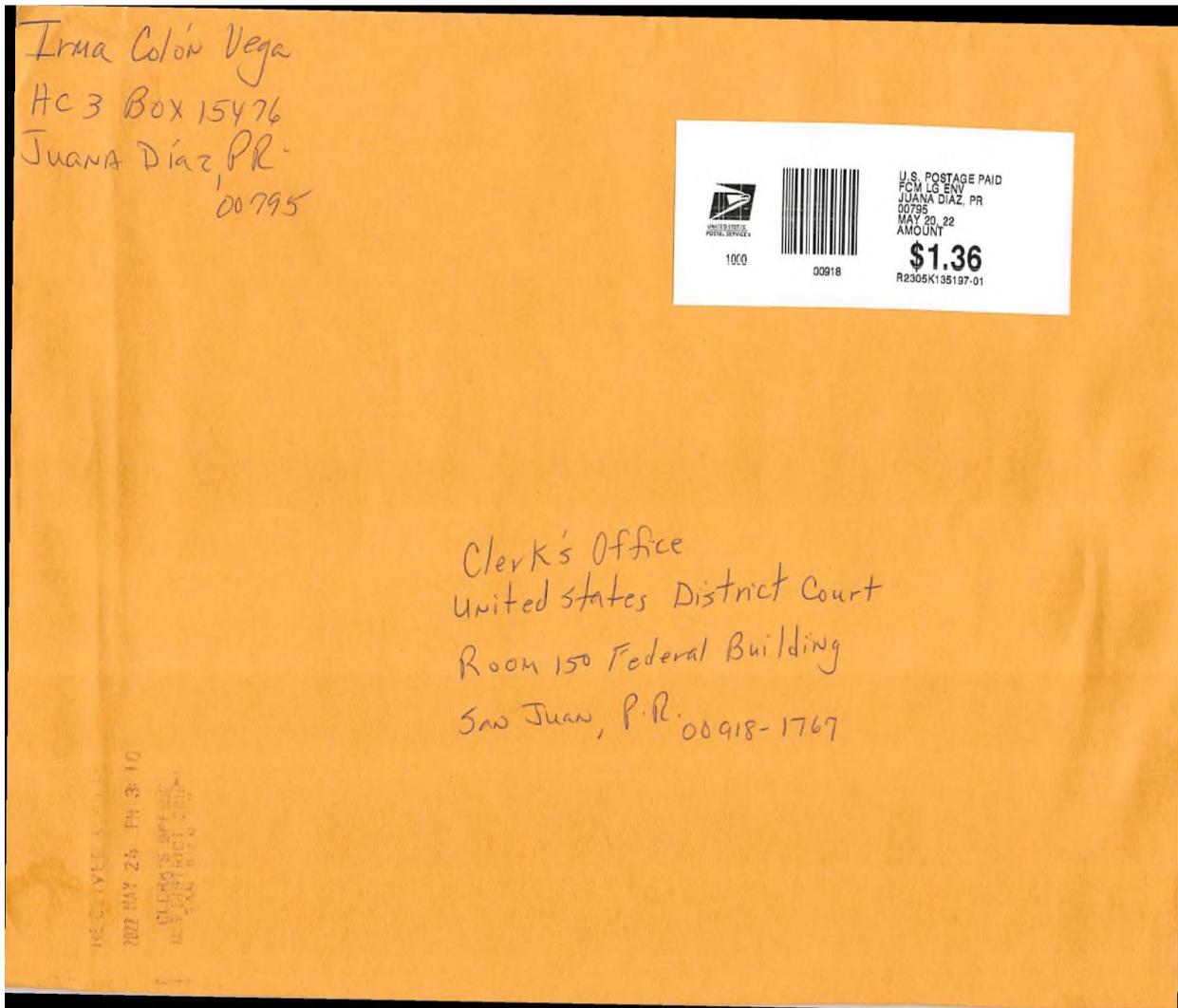
For the former employee referenced above, we certify the following:

- She joined PRT/Claro effective December 5, 1988.
- She worked as a regular employee through January 1, 2011.
- As on the date of her separation, she earned an hourly wage of

This certification has a raised seal that confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Monday, February 3, 2020.

[signature]

Abigail Alejandro González  
Compensation Officer  
Compensation and Records





T 718.384.8040  
W [TargemTranslations.com](http://TargemTranslations.com)  
E [projects@targemtranslations.com](mailto:projects@targemtranslations.com)  
A 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 140270 DN 21054**

Signed this 18<sup>TH</sup> of July 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

Andreea I. Boscor

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor". A blue line points from the text "Signed this 18<sup>TH</sup> of July 2022" towards the signature.